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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
KRISTY LYNN FELKINS,  
  
Defendant.

CASE NO. 2:20-CR-00175-TLN

STIPULATION AND ORDER FOR EXTENSION  
OF TIME FOR STATUS CONFERENCE AND  
EXCLUSION OF TIME

DATE: November 12, 2020  
TIME: 9:30 a.m.  
COURT: Hon. Troy L. Nunley

Plaintiff United States of America, by and through its attorney of record, Assistant United States Attorney GRANT B. RABENN, and defendant KRISTY LYNN FELKINS, both individually and by and through her counsel of record, LINDA C. ALLISON and HANNAH R. LABAREE, hereby stipulate as follows:

1. The Indictment in this case was filed on September 25, 2020, and defendant first appeared before a judicial officer of the Court in which the charges in this case were pending on September 30, 2020. By previous order, this matter was set for status on November 12, 2020 at 9:30 a.m.

2. By this stipulation, defendant now moves to continue the status conference until February 25, 2021, at 9:30 a.m., and to exclude time between November 12, 2020, and February 25, 2021, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

1           a)       The government has represented that the discovery associated with this case  
2 includes reports and related documents constituting hundreds of pages of discovery. All of this  
3 discovery has been either produced directly to counsel and/or made available for inspection and  
4 copying.

5           b)       Counsel for defendant desires additional time to consult with her client, to review  
6 the current charges, conduct investigation and research related to the charges, to review and copy  
7 discovery, and discuss potential resolution with the client.

8           c)       Counsel for defendant believes that failure to grant the above-requested  
9 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
10 into account the exercise of due diligence.

11           d)       The government does not object to the continuance.

12           e)       Based on the above-stated findings, the ends of justice served by continuing the  
13 case as requested outweigh the interest of the public and the defendant in a trial within the  
14 original date prescribed by the Speedy Trial Act.

15           f)       For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
16 et seq., within which trial must commence, the time period of November 12, 2020 to February  
17 25, 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local  
18 Code T4] because it results from a continuance granted by the Court at defendant's request on  
19 the basis of the Court's finding that the ends of justice served by taking such action outweigh the  
20 best interest of the public and the defendant in a speedy trial.

21           4.       Nothing in this stipulation and order shall preclude a finding that other provisions of the  
22 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
23 must commence.

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26           IT IS SO STIPULATED.  
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1 Dated: November 10, 2020

McGREGOR W. SCOTT  
United States Attorney

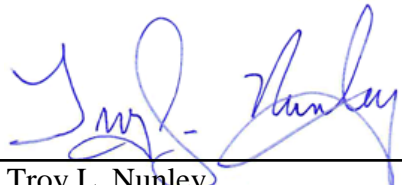
2  
3 /s/ GRANT B. RABENN  
GRANT B. RABENN  
Assistant United States Attorney

5 Dated: November 10, 2020

6 /s/ LINDA C. ALLISON  
LINDA C. ALLISON  
Counsel for Defendant  
KRISTY LYNN FELKINS

9  
10 **FINDINGS AND ORDER**

11 IT IS SO FOUND AND ORDERED this 12<sup>th</sup> day of November, 2020.

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16 Troy L. Nunley  
United States District Judge